

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

2-10 P/B LK RH.

BRETT T. CULVER

Plaintiff,

v.

COMMONWEALTH OF PENNSYLVANIA,
et al.,

Defendants'

MOTION FOR AN ORDER
COMPELLING DISCOVERYCase No. 1:cv-01-0904

(Judge Kane)

Plaintiff moves this court for an Order pursuant to Rule 37 (a) of the Federal Rules of Civil Procedure compelling Defendants' to answer fully interrogatories 01-cv-01-0904 (dated 03-01-02), copies of which are attached hereto. *(Defendants have these copies)* Plaintiff submitted these interrogatories pursuant to Rule 33 of the Federal Rules of Civil Procedure (or written request for disclosure pursuant to Rule 34 of the Federal Rules of Civil Procedure) on 03-01-02, but defendants' have to present refused to comply with disclosure of the itemized and identified information/record documentations/evidence of incidents cited in this case.

Plaintiff also moves for an Order pursuant to Rule 37 (a)(4) requiring the aforesaid defendants to pay Plaintiff the sum of \$2,500.00 as reasonable expenses in obtaining this Order, on the ground that the Defendants' refusals to answer the interrogatories (or produce documents/evidence upon request) had no substantial justification, and has hindered proceedings in this case.

This motion is based upon the papers and files in this matter, with this Plaintiff's legal right to the information, answers, and evidence relevant to all violations of complaint.

Dated: 9-02-03



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v.

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Defendants'

REQUEST FOR PRODUCTION
OF DOCUMENTS

Case No. 1:cv-01-0904

(Judge Kane)

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, and pursuant to no Court Order closing Discovery in case 01-cv-01-0904, the defendants' are required to produce for inspection and copying all information/record documentations/evidence identified and out-lined in Plaintiff's First Set Of Interrogatories (dated 03-01-02), which defendants' refused to comply with information/record documentations/evidence identified and itemized.

Dated: 09-02-03

